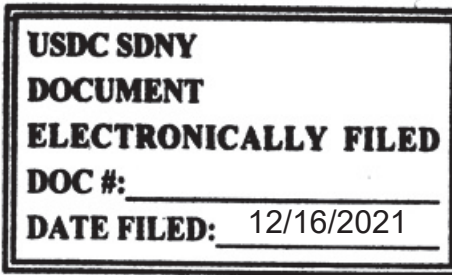




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December 16, 2021

VIA ECF

Hon. Robert W. Lehrburger, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007

Re: Paul Napoli and Marie Kaiser Napoli v. Chartis Property Casualty Company, now known as AIG Property Casualty Company, and National Surety Corporation
Docket No.: 1:21-cv-09279-AJN-RWL

Dear Judge Lehrburger,

This office represents Defendant, Chartis Property Casualty Company, now known as AIG Property Casualty Company ("AIGPCC"), in the above-referenced matter. Without waiving any affirmative defenses, we submit this letter motion requesting an extension of AIGPCC's time to answer, move, or otherwise respond to the Complaint. This letter motion is submitted pursuant to Your Honor's Individual Rule I.(F). No prior extensions have been requested.

Our records indicate that AIGPCC was served with Plaintiffs' Complaint on November 30, 2021, making AIGPCC's response to the Complaint due December 21, 2021. We request an extension of this deadline to January 17, 2022. The extension is requested in light of the upcoming holidays and to permit my office the requisite time to obtain and review the documents related to this new case. Counsel for Plaintiffs has kindly consented to the requested extension.

Respectfully submitted,

/s/ Neil V. Mody

Neil V. Mody

cc: All Counsel of Record (via ECF)

SO ORDERED:

12/16/2021

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HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE